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***UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY***

**UNITED STATES OF  
AMERICA,**

*Plaintiff,*

v.

**ARTISAN  
MANUFACTURING  
CORPORATION AND  
JIANXIONG HAN,**

**Honorable**

*Civil Action No.*

**COMPLAINT TO ENFORCE  
SETTLEMENT AGREEMENT**

*Defendants.*

Plaintiff, the United States of America, on behalf of the United States Customs and Border Patrol, by its attorney, Craig Carpenito, United States Attorney for the District of New Jersey (David E. Dauenhimer, Assistant United States Attorney appearing), brings this action to enforce the settlement agreement previously entered into by the parties on April 16, 2019, pursuant to the False Claims Act, 31 U.S.C. §§ 3729-3733, as amended.

### **INTRODUCTION**

1. This is an action seeking to enforce the civil settlement agreement entered into by the parties on April 16, 2019, pursuant to the False Claims Act, 31 U.S.C. §§ 3729 - 3733, as amended. *See* Ex. 1 – Settlement Agreement. The Government’s Complaint seeks enforcement of the settlement agreement pursuant to its terms through the entry of the previously agreed upon and executed consent order. *See* Ex. 1 Attachment C – Consent Order.
2. The parties entered the settlement agreement to resolve claims that with respect to the imports of drawn stainless steel sinks from the Peoples Republic of China (“PRC”) during the period of November 1,

2012 to January 2, 2014, Artisan Manufacturing Corporation (also known as Artisan Manufacturing Company Corp.) and Jianxiong Han (collectively “Artisan”) knowingly engaged in fraudulent conduct to evade paying antidumping and countervailing duties owed to the United States. *See* Ex. 1, Para. G.

3. The settlement agreement required Defendants to pay \$490,000 in accordance with an agreed upon schedule. *See* Ex 1, Attachment B.

4. Defendants defaulted almost immediately and have made just one \$4,000.00 payment on a 72-month payment schedule since the settlement agreement was executed more than 18 months ago on April 16, 2019. *See* Ex. 2 – Declaration of Yolanda Hickman.

### **JURISDICTION AND VENUE**

5. This action arises under the False Claims Act (FCA), 31 U.S.C. §§3729 - 3733, as amended, and at common law. This Court has subject matter jurisdiction over this action under 31 U.S.C. § 3730(a) and 28 U.S.C. § 1345.

6. Venue is proper in the District of New Jersey pursuant to 31 U.S.C. § 3732(a), 28 U.S.C. § 1391(b) and 28 U.S.C. § 1395(a).

### **THE PARTIES**

7. Plaintiff is the United States of America (“United States”), on behalf of its agency, Customs and Border Protection (“CBP”).

8. Defendant, Artisan Manufacturing Corporation (also known as Artisan Manufacturing Company Corp.), is a New York Corporation with its headquarters in Newark, New Jersey. As noted in the Settlement Agreement, Defendant Jianxiong Han operates and serves as a corporate officer of Artisan. Han directed the decisions regarding Artisan’s importation process for drawn stainless steel sinks. *See* Ex. 1, Para. F.

### **FACTUAL BACKGROUND AND REQUEST FOR ENTRY OF CONSENT ORDER**

9. The parties executed the Settlement Agreement in this matter on April 16, 2019. *See* Ex. 1.

10. Defendants made one payment of \$4,000.00 on May 9, 2019. *See* Ex. 2.

11. Defendants have failed to make another payment pursuant to the

settlement agreement despite repeated efforts by the government to seek compliance and promises of the same from Defendants.

12. Pursuant to the terms of the agreement, the United States now seeks entry of the previously signed consent judgment so that it may pursue collection of the unpaid settlement amount due. *See* Ex. 1, Paras. 4-6 and Attachment C.

13. As detailed in Ms. Hickman's Declaration and pursuant to the terms of the settlement agreement, the remaining unpaid settlement amount consists of \$486,000 plus applicable interest from May 9, 2019, which amounts to \$507,706.22 as of December 1, 2020.

14. The United States thus requests entry of the consent judgment reflecting the current unpaid settlement amount as immediately due to the United States.

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Wherefore, plaintiff, United States, requests that the attached consent judgment be entered in its favor and against Defendants, Artisan Manufacturing Corporation and Jianxiong Han.

Respectfully submitted,

CRAIG CARPENITO  
UNITED STATES ATTORNEY

/s David E. Dauenheimer  
DAVID E. DAUENHEIMER  
Assistant United States Attorney